

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

QUALCOMM INCORPORATED,)	
a Delaware corporation; and)	
QUALCOMM TECHNOLOGIES, INC.,)	
a Delaware corporation,)	
)	
Plaintiffs,)	C.A. No. 24-490 (MN)
)	
v.)	
)	
ARM HOLDINGS PLC., f/k/a ARM LTD.,)	
a U.K. corporation,)	
)	REDACTED PUBLIC VERSION
)	
Defendant.)	

**DECLARATION OF CATHERINE NYARADY IN SUPPORT OF PLAINTIFFS'
OPENING BRIEF IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT**

VOLUME 1 of 2

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QUALCOMM INCORPORATED,)	
a Delaware corporation; and)	
QUALCOMM TECHNOLOGIES, INC.,)	
a Delaware corporation,)	
)	
Plaintiffs,)	C.A. No. 24-490 (MN)
)	
v.)	[REDACTED]
)	[REDACTED]
ARM HOLDINGS PLC., f/k/a ARM LTD.,)	
a U.K. corporation,)	
)	
Defendant.)	

**DECLARATION OF CATHERINE NYARADY IN SUPPORT OF PLAINTIFFS’
OPENING BRIEF IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT**

I, Catherine Nyarady, declare under penalty of perjury that the following is true and correct:

I am an attorney at the law firm of PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP, counsel of record for Qualcomm Inc. and Qualcomm Technologies, Inc. (collectively, “Plaintiffs”) in the above-captioned action. I am a member in good standing of the State Bar of New York and was admitted to practice before this Court *pro hac vice* on April 30, 2024. I am competent to testify to the matters stated herein, have personal knowledge of the facts and statements in this declaration, and each of the facts and statements is true and correct.

1. Attached hereto as **Exhibit 1** is a true and correct copy of the Qualcomm ALA, dated [REDACTED], Bates numbered ARM_00055357.
2. Attached hereto as **Exhibit 2** is a true and correct copy of the Qualcomm TLA, dated [REDACTED], Bates numbered ARM_00103918.
3. Attached hereto as **Exhibit 3** is a true and correct copy of Arm Holdings plc’s Form 20-F for the fiscal year ended March 31, 2025, dated May 28, 2025.

4. Attached hereto as **Exhibit 4** is a true and correct copy of Arm Holdings plc's Form 20-F for the fiscal year ended March 31, 2024, dated May 29, 2024.

5. Attached hereto as **Exhibit 5** is a true and correct copy of the transcript of the June 20, 2025 Deposition of Martin Weidmann.

6. Attached hereto as **Exhibit 6** is a true and correct copy of the transcript of the July 9, 2025 Deposition of Jignesh Trivedi.

7. Attached hereto as **Exhibit 7** is a true and correct copy of a letter from Ann Chaplin to Spencer Collins, dated December 5, 2022, Bates numbered ARM_00025401.

8. Attached hereto as **Exhibit 8** is a true and correct copy of the transcript of the July 11, 2025 Deposition of Vivek Agrawal.

9. Attached hereto as **Exhibit 9** is a true and correct copy of a letter from Spencer Collins to Ann Chaplin, dated January 8, 2025, Bates numbered QCVARM_0573677.

10. Attached hereto as **Exhibit 10** is a true and correct copy of an email from Rene Haas to Phil Carmack, dated August 31, 2022, Bates numbered ARM_00110507.

11. Attached hereto as **Exhibit 11** is a true and correct copy of the transcript of the July 7, 2025 Deposition of Rene Haas.

12. Attached hereto as **Exhibit 12** is a true and correct copy of an email from Spencer Collins to Rene Haas, attaching a letter from Spencer Collins to Ann Chaplin, dated October 22, 2024, Bates numbered ARMQC_02749014.

13. Attached hereto as **Exhibit 13** is a true and correct copy of an email from Kenneth Siegel to Rene Haas, *et al.*, dated October 23, 2024, Bates numbered ARMQC_02770389.

14. Attached hereto as **Exhibit 14** is a true and correct copy of Arm's Second Supplemental Objections and Responses to Qualcomm's First Set of Interrogatories, dated September 5, 2025.

15. Attached hereto as **Exhibit 15** is a true and correct copy of the transcript of the June 30, 2025 Deposition of Spencer Collins.

16. Attached hereto as **Exhibit 16** is a true and correct copy of the transcript of the July 17, 2025 Deposition of Paul Kranhold.

17. Attached hereto as **Exhibit 17** is a true and correct copy of an email from Kurt Wolf to Dawn Hill, *et al.*, dated April 2, 2024, Bates numbered QCVARM_0524362.

18. Attached hereto as **Exhibit 18** is a true and correct copy of the transcript of the June 24, 2025 Deposition of Manju Varma.

19. Attached hereto as **Exhibit 19** is a true and correct copy of an email from Will Abbey to Kristin Webster, dated May 24, 2024, Bates numbered ARMQC_02784199.

20. Attached hereto as **Exhibit 20** is a true and correct copy of an email from Jeff Fonseca to Doreen Wei, *et al.*, dated February 10, 2025, Bates numbered ARMQC_02777458.

21. Attached hereto as **Exhibit 21** is a true and correct copy of the transcript of the July 11, 2025 Deposition of Larissa Cochran.

22. Attached hereto as **Exhibit 22** is a true and correct copy of a letter from Ann Chaplin to Spencer Collins, dated September 27, 2024, Bates numbered QCVARM_0616952.

23. Attached hereto as **Exhibit 23** is a true and correct copy of Annex 1 to the Qualcomm TLA, dated [REDACTED], Bates numbered ARMQC_02747848.

24. Attached hereto as **Exhibit 24** is a true and correct copy of a [REDACTED]
[REDACTED], dated [REDACTED], Bates numbered ARMQC_02771946.

25. Attached hereto as **Exhibit 25** is a true and correct copy of the [REDACTED]
[REDACTED] Bates numbered QCVARM_0710047.

26. Attached hereto as **Exhibit 26** is a true and correct copy of the Expert Report of Patrick F. Kennedy, dated August 8, 2025.

27. Attached hereto as **Exhibit 27** is a true and correct copy of the transcript of the June 26, 2025 Deposition of Ehab Youssef.

28. Attached hereto as **Exhibit 28** is a true and correct copy of the transcript of the June 20, 2025 Deposition of Karthik Shivashankar.

29. Attached hereto as **Exhibit 29** is a true and correct copy of the transcript of the July 10, 2025 Deposition of Akshay Bhatnagar.

30. Attached hereto as **Exhibit 30** is a true and correct copy of the transcript of the July 9, 2025 Deposition of Jeffrey Fonseca.

31. Attached hereto as **Exhibit 31** is a true and correct copy of a letter from Qualcomm to Special Master Helena C. Rychlicki, dated October 17, 2025.

32. Attached hereto as **Exhibit 32** is a true and correct copy of the Expert Report of Patrick F. Kennedy, dated September 19, 2025.

33. Attached hereto as **Exhibit 33** is a true and correct copy of the [REDACTED]
[REDACTED] between Arm and [REDACTED] dated December 16, 2021, Bates numbered ARMQC_02797987.

34. Attached hereto as **Exhibit 34** is a true and correct copy of a letter from Qualcomm to Special Master Helena C. Rychlicki, dated October 17, 2025.

35. Attached hereto as **Exhibit 35** is a true and correct copy of the transcript from the August 14, 2025 hearing before Special Master Helena C. Rychlicki.

36. Attached hereto as **Exhibit 36** is a true and correct copy of a letter from Qualcomm to Special Master Helena C. Rychlicki, dated September 15, 2025.

37. Attached hereto as **Exhibit 37** is a true and correct copy of the [REDACTED] [REDACTED] t between Arm and [REDACTED] dated January 24, 2024, Bates numbered ARMQC_02774844.

38. Attached hereto as **Exhibit 38** is a true and correct copy of Arm's Second Supplemental Objections and Responses to Qualcomm's Second Set of Interrogatories, dated September 5, 2025.

39. Attached hereto as **Exhibit 39** is a true and correct copy of Arm's Second Supplemental Response to Qualcomm's Third Set of Interrogatories, dated September 5, 2025.

40. Attached hereto as **Exhibit 40** is a true and correct copy of *Arm Ltd. v. Qualcomm Inc.*, C.A. No. 22-1146 (MN), D.I. 631, dated September 30, 2025.

41. Attached hereto as **Exhibit 41** is a true and correct copy of *Arm Ltd. v. Qualcomm Inc.*, C.A. No. 22-1146 (MN), D.I. 572, dated December 20, 2024.

42. Attached hereto as **Exhibit 42** is a true and correct copy of *Arm Ltd. v. Qualcomm Inc.*, C.A. No. 22-1146 (MN), D.I. 300, dated March 13, 2024.

43. Attached hereto as **Exhibit 43** is a true and correct copy of *Arm Ltd. v. Qualcomm Inc.*, C.A. No. 22-1146 (MN), D.I. 596, dated January 17, 2025.

44. Attached hereto as **Exhibit 44** is a true and correct copy of *Arm Ltd. v. Qualcomm Inc.*, C.A. No. 22-1146 (MN), D.I. 598, dated January 17, 2025.

45. Attached hereto as **Exhibit 45** is a true and correct copy of *Arm Ltd. v. Qualcomm Inc.*, C.A. No. 22-1146 (MN), D.I. 634, dated September 30, 2025.

46. Attached hereto as **Exhibit 46** is a true and correct copy of *Arm Ltd. v. Qualcomm Inc.*, C.A. No. 22-1146 (MN), D.I. 1, dated August 31, 2022.

47. Attached hereto as **Exhibit 47** is a true and correct copy of the transcript of the October 3, 2025 Deposition of Thomas Britven.

48. Attached hereto as **Exhibit 48** is a true and correct copy of the transcript of the June 26, 2025 Deposition of William Abbey.

49. Attached hereto as **Exhibit 49** is a true and correct copy of the Expert Report of Thomas W. Britven, dated September 5, 2025.

50. Attached hereto as **Exhibit 50** is a true and correct copy of the [REDACTED] between Arm and [REDACTED], dated August 1, 2021, Bates numbered ARMQC_02797767.

51. Attached hereto as **Exhibit 51** is a true and correct copy of the [REDACTED] between Arm and [REDACTED], dated September 17, 2024, Bates numbered ARMQC_02797381.

52. Attached hereto as **Exhibit 52** is a true and correct copy of the [REDACTED] between Arm and [REDACTED], dated September 30, 2021, Bates numbered ARMQC_02797454.

53. Attached hereto as **Exhibit 53** is a true and correct copy of [REDACTED] between Arm and [REDACTED] dated December 29, 2023, Bates numbered ARMQC_02797547.

54. Attached hereto as **Exhibit 54** is a true and correct copy of the [REDACTED] between Arm and [REDACTED], dated March 31, 2023, Bates numbered ARMQC_02797555.

55. Attached hereto as **Exhibit 55** is a true and correct copy of the [REDACTED] [REDACTED] between Arm and [REDACTED] dated September 29, 2021, Bates numbered ARMQC_02797603.

56. Attached hereto as **Exhibit 56** is a true and correct copy of the [REDACTED] [REDACTED] between Arm and [REDACTED] dated June 24, 2024, Bates numbered ARMQC_02797692.

57. Attached hereto as **Exhibit 57** is a true and correct copy of the [REDACTED] [REDACTED] between Arm and [REDACTED], dated March 13, 2023, Bates numbered ARMQC_02797308.

58. Attached hereto as **Exhibit 58** is a true and correct copy of a letter from Jay Emerick to Catherine Nyarady, dated July 24, 2025.

59. Attached hereto as **Exhibit 59** is a true and correct copy of the transcript from the October 10, 2025 meet and confer between Qualcomm and Arm.

60. Attached hereto as **Exhibit 60** is a true and correct copy of a letter from Peter Evangelatos to Catherine Nyarady, dated October 16, 2025.

61. Attached hereto as **Exhibit 61** is a true and correct copy of an email from Kurt Wolf to Karl Whealton, *et al.*, dated February 8, 2025, Bates numbered QCVARM_0447252.

62. Attached hereto as **Exhibit 62** is a true and correct copy of Volume 5 (December 19, 2024) of the trial transcript in *Arm Ltd. v. Qualcomm Inc.*, C.A. No. 22-1146 (MN).

63. Attached hereto as **Exhibit 63** is a true and correct copy of the transcript of the July 11, 2025 Deposition of Ann Chaplin.

64. Attached hereto as **Exhibit 64** is a true and correct copy of the transcript of the July 3, 2025 Deposition of Cristiano Amon.

65. Attached hereto as **Exhibit 65** is a true and correct copy of *Arm Ltd. v. Qualcomm Inc.*, C.A. No. 22-1146 (MN), D.I. 606, dated February 12, 2025.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed this 24th day of October, 2025, in New York, New York.

/s/ Catherine Nyarady
Catherine Nyarady

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on October 24, 2025, upon the following in the manner indicated:

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/s/ Jennifer Ying

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